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February 11, 2025

**BY ECF**

Honorable Andrew L. Carter  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Maila Beach v. The City of New York, et. al.,  
21-CV-06737 (ALC)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, and Senior Counsel Yini Zhang's supervisor. I write to respectfully request a 30 day extension for defendants City and Sergeant Dowling to respond to plaintiff's second amended complaint from February 14, 2025 to March 17, 2025.<sup>1</sup> The reason for the request is that Ms. Zhang is unexpectedly out of the office due to health issues and will need additional time to respond to the second amended complaint on behalf of the defendants. This is the second request for extension of this deadline, and plaintiff's counsel, Tahanie Aboushi, Esq., consents to this request.

Thank you for your time and attention to this matter.

Respectfully submitted,

Jenny Weng  
Jenny Weng

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<sup>1</sup> This Office hopes the Court will *sua sponte* similarly extend the time for Officers Erica Liang and Carlos Garcia to respond to the second amended complaint until March 17, 2025. A decision concerning this Office's representation of Officers Erica Liang and Carlos Garcia has not yet been made and this request is not made on their behalf. Given the time involved in determining the representation of a police officer, and in the interest of judicial economy, we would hope that the Court would, *sua sponte*, extend the time to respond on behalf of Officers Erica Liang and Carlos Garcia until March 17, 2025 as well.

*Senior Counsel*

cc: ALL COUNSEL (via ECF)